

HHS Privacy Impact Assessment (PIA)

Date of this Submission: **11/18/2003**

HHS Agency (OPDIV): **CMS**

Title of System or Information Collection: **Managed Care Systems**

Is this System or Information Collection new or is an existing one being modified? **Existing**

Identifying Numbers (Use N/A, where appropriate)

Unique Project Identifier Number: **N/A**

System of Records Number: **09-70-4001**

OMB Information Collection Approval Number and Expiration Date: **N/A**

Other Identifying Number(s): **N/A**

Description

1. Provide an overview of the system or collection and indicate the legislation authorizing this activity.

APPLICABLE LAWS OR REGULATIONS AFFECTING THE SYSTEM

Refer to the Master Plan. In addition: Sections 1833, 1852, 1876, of the Social Security Laws, and Section 422 of the Regulations

The GHP was implemented in 1990 to assist CMS in calculating beneficiary-level payments and producing the aggregate MCO-level payment for use in the Automated Plan Payment System (APPS). The GHP System provides CMS Central Office, Regional Office and Managed Care Organizations (MCO) with access to Medicare beneficiary information. There are approximately 1500 users. The GHP system is comprised of five subsystems: Managed Care Option Information System (MCCOY), GHP Report Output User Communication Help (GROUCH), Plan Information Control System (PICS), Automated Payment Plan System (APPS), and Reconciliation System (RECON). GHP receives transmitted data, processes enrollments and payments, and creates reports for MCO. The GHP System also interacts with one CMS internal system, the Enrollment Database (EDB) for entitlement. Each MCO has the responsibility to conform to the minimum CMS standards for the transmission and encryption of data of all types of data.

2. Describe the information the agency will collect and how the agency will use the collected information. Explain how the data collected are the minimum necessary to accomplish the purpose for this effort.

The GHP application handles and stores Privacy Act sensitive information, to include individually identifiable beneficiary data. The GHP application mission is to calculate beneficiary-level payments and produce the aggregate MCO-level payments. This application is critical to CMS. Failure of this application to function could have severe impact on beneficiaries, or could provide a high potential for fraud, waste or abuse. The information processed by the GHP application is sensitive and requires safeguarding against disclosure to unauthorized personnel. Therefore, the confidentiality of the MCS-[MA](#) is rated to be High. If personnel, authorized or unauthorized, modified applications, medical or financial information, the potential is great for major delays and inaccurate information being reported. Therefore, the integrity of the MCS-[MA](#) is rated to be High. The GHP application must be available on a daily basis in order for CMS and MCO users to perform daily job requirements. Denial of service to the GHP application would jeopardize the ability of CMS and MCO users to perform the mission of the agency. Therefore, the availability of the MCS-[MA](#) is rated to be High.

3. Explain why the information is being collected. **N/A**
4. Identify with whom the agency will share the collected information. **N/A**
5. Describe how the information will be obtained, from whom it will be collected, what the suppliers of information and the subjects will be told about the information collection, and how this message will be conveyed to them (e.g., written notice, electronic notice if a web-based collection, etc.). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared. **N/A**
6. State whether information will be collected from children under age 13 on the Internet and, if so, how parental or guardian approval will be obtained. (Reference: Children's Online Privacy Protection Act of 1998) **N/A**
7. Describe how the information will be secured. **N/A**
8. Describe plans for retention and destruction of data collected. **N/A**
9. Identify whether a system of records is being created under section 552a of Title 5, United States Code (the Privacy Act), or identify the existing Privacy Act system of records notice under which the records will be maintained. **N/A**

Endorse

_____/s/_____
J. Ned Burford
CMS Privacy Officer

Date 11/21/2003_____

Endorse

_____/s/_____
Timothy P. Love
Chief Information Officer

Date: 11/21/2003_____

Approve

_____/s/_____
Thomas A. Scully
CMS Administrator

Date: 11/21/2003_____